

# REO LAW LLC

**Bryan A. Reo, Esq.**

**Admissions:**

- **Ohio ((#0097470))**
- **Michigan ((#P84119))**
- **N.D. Ohio**
- **S.D. Ohio**
- **E.D. Michigan**
- **W.D. Michigan**
- **3rd Circuit**
- **6th Circuit**
- **USCAAF ((#37033))**

**Reo Law LLC**

**P.O. Box 5100**

**Mentor, Ohio 44061**

**(P): (216) 505-0811**

**Reo@ReoLaw.org**

CIVIL LITIGATION

CONSUMER  
PROTECTION

DEFAMATION/LIBEL

INTENTIONAL TORTS

COLLECTIONS [For  
Attorneys/Law Firms]

NEGOTIATIONS

APPEALS [CRIMINAL  
AND CIVIL]

EXTRAORDINARY  
WRITS

CIVIL PROTECTION  
ORDERS

CIVIL RIGHTS

CONSTITUTIONAL  
LAW

FIRST AMENDMENT

SECOND  
AMENDMENT

June 1, 2020

RE- Jacovetti Law P.C., et. al v. James Everett Shelton, et. al,  
Case No. 2:20-cv-00163-JDW

Joshua L. Thomas, Esq.  
225 Wilmington-West Chester Pike, Ste. 200,  
Chadds Ford, PA 19317

Via E-mail to: [joshualthomas@gmail.com](mailto:joshualthomas@gmail.com)

Dear Mr. Thomas,

As you know, I represent Defendants James Everett Shelton and Final Verdict Solutions (“Defendants”) in the above-captioned civil action. This letter is being sent pursuant to Fed.R.Civ.P. 11. Attached to this letter is a true and correct copy of Defendants’ Motion for Sanctions Pursuant to Rule 11.

For the reasons set forth in Defendants’ Motion for Dismissal pursuant to Rule 12(b)(6) and in the attached Motion for Sanctions, this action is entirely without merit and was brought for improper purposes. At no time has Mr. Shelton and/or FVS engaged in a “RICO” conspiracy with anyone else. Furthermore, it is not a RICO violation for Mr. Shelton to seek relief under the TCPA against telemarketers who illegally call him.

Furthermore, my client believes this action was filed against him in an attempt to deter him from enforcing his rights to collect on the \$54,000.00 judgment duly and properly obtained against FCS Capital LLC, Emil Yashayev, and Barry Shargel in Case No. 2:18-cv-03723-JDW (E.D.Pa. Dec. 11, 2019). This is considered an “improper purpose” under Rule 11.

Defendants demand that you dismiss this action against them with prejudice immediately. If that is not done within twenty-one (21) days, Defendants will file the attached Motion for Sanctions. Upon the conclusion of this case, Defendants may also consider initiating an action against you, your law firm, and your clients under Pennsylvania’s Dragonetti Act for “wrongful use of civil proceedings”. See 42 Pa.C.S. § 8351 et. seq. Please govern yourself accordingly.

Please note that we will seek sanctions against you and your clients, jointly and severally, and I when a sanctions judgment is issued, so long as it is jointly and severally, we will seek to collect against you.

**REO LAW, LLC**

/s/ Bryan Anthony Reo  
Bryan Anthony Reo (#0097470)  
Reo Law LLC  
P.O. Box 5100  
Mentor, Ohio 44061  
(P): (216) 505-0811  
(E): [Reo@ReoLaw.org](mailto:Reo@ReoLaw.org)

**THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**